

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CLAUDIA TERRANOVA and THOMAS
TERRANOVA,

Plaintiffs,

-against-

TOYOTA OF NEWBURGH and TOYOTA
MOTOR SALES U.S.A., INC.

Defendants.
-----X

**NOTICE OF MOTION
TO REMAND**

Civil Action No.: 08-CV-01217
Hon. William C. Conner, USDJ

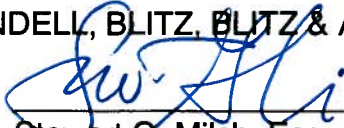
PLEASE TAKE NOTICE, that upon the accompanying Affirmation of Stewart G. Milch, dated March 28, 2008 and the accompanying exhibits thereto, the accompanying Memorandum of Law and Statement of Undisputed Facts, plaintiffs Claudia Terranova and Thomas Terranova ("plaintiffs" or "the Terranovas"), by and through their attorneys, Shandell, Blitz, Blitz & Ashley, LLP, will move this Court at the United States Courthouse, White Plains, New York on a date to be set by the Honorable William C. Conner on or after April 25, 2008, for an Order: (i) pursuant to 28 U.S.C. § 1447 remanding this matter to the Supreme Court of the State of New York, Orange County; or, alternatively, (ii) pursuant to 28 U.S.C. § 1447 (e) permitting joinder of additional defendants and thereafter remanding this matter to state court; and (iii) for such other and further relief as this Court shall deem just and proper.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, are to be served on or before April 18, 2008, in accordance with the directives of the Court as stated by the Honorable William C. Conner during a conference call with the parties' counsel on March 7, 2008.

Dated: New York, New York
March 28, 2008

SHANDELL, BLITZ, BLITZ & ASHLEY, LLP

By:



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